REMARKS

Claims 2-16 are pending in the application. Claims 2, 8, 10, and 16 have been amended hereby. Claim 1 has been cancelled, without prejudice or disclaimer. Claims 2, 11, 15, and 16 are in independent form. Favorable reconsideration is requested.

Claims 3 and 11 have been amended to change the language objected to in the Office Action in paragraph 1. Withdrawal of the objection thereof is requested.

Reconsideration is respectfully requested of the rejection of Claim 3 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement.

Claim 3 has been amended to the change the recitation "APR request" to "ARP request."

Accordingly, it is respectfully submitted that amended Claim 3 complies with the written description requirement, and meets all requirements of 35 U.S.C. §112.

Reconsideration is respectfully requested of the rejection of Claim 11 under 35 U.S.C. §112, second paragraph, as being indefinite.

Claim 11 has been amended to the change the recitation "A framed relay device" to "A frame relay device."

Accordingly, it is respectfully submitted that amended Claim 11 is clear and definite in its recitation of the present invention, and meets all requirements of 35 U.S.C. §112.

Reconsideration is respectfully requested of the rejection of Claims 1-3, 5-7, and 16 under 35 U.S.C §102(e), as being anticipated by U.S. Patent No. 7,134,012 ("Doyle"); of the rejection of Claims 11-15 under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 7,523,485 ("Kuan"); of the rejection of Claim 4 under 35 U.S.C. §103(a), as being obvious over Doyle in view of U.S. Patent No. 6,195,356 ("Anello"); and of the rejection of Claims 8-10, as being obvious over Doyle in view of Kuan.

INDEPENDENT CLAIMS 2 AND 16

Amended independent Claim 2 and 16 recite "*registering an entry containing a pair of source addresses satisfying the conditions in the table; and excluding a pair of source addresses failing to satisfy the conditions from an object to be registered in the table.*"

Doyle discloses:

> *An ARP request is sent to the source IP address (block 625) and the routing device waits for a response (block 630). If a response is received, the ARP table 170 table is updated with the IP address and the MAC address from the response (block 635)* (Doyle: col. 9, ll. 38-43; Fig.6).
>
> *The results of the ARP request could then be used to determine if the MAC address was bound to the IP address at the source device or the physical address of a routing device utilizing the techniques as described herein* (Doyle: col. 10, ll. 24-27).

Doyle, however, does not disclose "*registering an entry containing a pair of source addresses satisfying the conditions in the table; and excluding a pair of source addresses failing to satisfy the conditions from an object to be registered in the table.*"

Therefore, Claim 2 and 16 are not anticipated by Doyle.

INDEPENDENT CLAIMS 11 AND 15

Independent Claims 11 and 15 recite "*judging unit for judging, for a frame received at each port, whether or not a pair of the same MAC address and the same port number as a pair of a source MAC address and a receiving port number of the frame is registered in the table.*"

Kwan discloses:

> *This source IP address and the corresponding MAC address are then storred in the table such that each MAC address and source IP address is correlated with each other as a source IP address/MAC address pair* (Kwan: col.4, ll.29-33).
>
> *To determine if the data packets received at a port contain a new source IP address that has not been learned, the ACL-CAM compares the source IP address and the MAC address in a received data packet, with the table of IP address/MAC address pairs* (Kwan: col.5, ll.26-30).
>
> *If there is more than one host device allowed per port, this process of determining MAC address and source IP address pairs will be repeated for each learned IP address on the port. Once a new source IP Address is confirmed, the inbound blocking procedures are applied to the port and includes the new source IP Address* (Kwan: col.6, ll.30-36).
>
> *The determined source MAC address is compared 404 with MAC addresses shown in a table 404. A determination 406 is made as to whether the source MAC address is new, which would mean that it is not in the table. If the source MAC address was previously stored in the table, then the source IP address and MAC address pair for the received data packet is compared 408 with the source IP address/MAC address pairs in the table* (Kwan: col.8, ll.59-66).
>
> *If more than one source IP address is permitted per port, then source IP spoofing is possible if the attacking host is using a validated MAC address, unless the source IP Security process as been activated to provide for port access based on correlating the learned source IP Address to its MAC address, such that access on a port is blocked, or permitted, based on the matching of the MAC/IP address pair in a received data packet with a MAC/IP address pair stored in a table* (Kwan: col.7, ll.22-30).

Kwan, however, does not disclose *"judging unit for judging, for a frame received at each port, whether or not <u>a pair of</u> the same <u>MAC address and</u> the same <u>port number</u> as a pair of a source MAC address and a receiving port number of the frame <u>is registered in the table</u>."*

Therefore, independent Claims 11 and 15 are not anticipated by Kwan.

The other cited references do not cure the deficiencies of Doyle and Kwan.

Accordingly, it is respectfully submitted that independent Claims 2, 11, 15, and 16, and the claims depending therefrom, are patentably distinct over the cited references, alone or in any possible combination.

In view of the amendments and remarks set forth above, this application is believed to be in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

/Pedro C. Fernandez/
Pedro C. Fernandez
Reg. No. 41,741

CUSTOMER NUMBER 026304

Telephone: (212) 940-6311
Fax: (212) 940-8986
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